## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:21-CR-

v. : (JUDGE )

THOMAS MCDONALD, : (electronically filed)

Defendant

#### INFORMATION

### Background

At times material to this Information:

- 1. The defendant, THOMAS MCDONALD, was a sworn police officer for the City of Scranton Police Department in Scranton,

  Pennsylvania, from in or about 2002 to in or about June 2020, and was entrusted with the power to enforce the laws of the Commonwealth of Pennsylvania and the City of Scranton.
- 2. MCDONALD was promoted to the rank of Corporal within the Scranton Police Department in or about 2009. From in or about 2015, MCDONALD was assigned to the Special Investigations Division (SID) of the Scranton Police Department and remained in SID until August 2019. The SID investigated drug offenses in the City of Scranton.

- 3. From in or about 2015 through August 2019, MCDONALD was a member of the Lackawanna County Drug Task Force (LCDTF) which was overseen by the Lackawanna County District Attorney's Office. As a member of the LCDTF, MCDONALD investigated drug offenses throughout Lackawanna County.
- 4. In or about 2018, MCDONALD was a member of the Organized Crime Drug Enforcement Task Force (OCDETF) which was overseen by the Pennsylvania Office of Attorney General. OCDETF is comprised of state and local law enforcement officers who investigated drug offenses throughout Luzerne and Lackawanna Counties.
- 5. As a Scranton police officer and deputized officer with the LCDTF and OCDETF, MCDONALD was an agent of the City of Scranton, Luzerne County, and Lackawanna County, and was responsible for conducting himself in compliance with federal, state and local laws.
- 6. As a Scranton police officer and deputized officer with the LCDTF and OCDETF, MCDONALD recruited and enlisted confidential informants to assist in drug investigations. At MCDONALD's direction

and under his supervision, confidential informants participated in controlled purchases.

7. From the time beginning in or about October 2017 through on or about April 2019, Persons #1 through #4 were confidential informants who participated in controlled purchases, or attempted to do so, at the direction and under the supervision of MCDONALD.

# COUNT 1 (Federal Program Bribery)

#### THE UNITED STATES ATTORNEY CHARGES:

- 8. The factual allegations of paragraphs 1 through 7 are incorporated herein.
- 9. In or about April or May 2018, the exact date unknown, in the Middle District of Pennsylvania, MCDONALD did corruptly solicit and demand for his own benefit, and accepted and agreed to accept, things of value from Person #1, that is, sex and sexual favors, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of the City of Scranton, valued at \$5,000 and more, that is, the criminal matter of Person #1 that involved a potential fine of \$5,000 and more, and during that same one-year period the City of Scranton, Lackawanna County, Pennsylvania,

received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of Federal assistance.

All in violation of Title 18 United States Code, Section 666(a)(1)(B).

> BRUCE D. BRANDLER ACTING U.S. ATTORNEY

DATE 7, 202/ BY: 7/

ASSISTANT U.S. ATTORNEY